

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Application of KARAM SALAH AL DIN
AWNI AL SADEQ for an Order Under
28 U.S.C. § 1782 to Conduct Discovery for
Use in Foreign Proceedings.
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Case No. _____

**[PROPOSED] ORDER GRANTING APPLICATION FOR JUDICIAL
ASSISTANCE IN OBTAINING EVIDENCE IN THIS DISTRICT FOR
USE IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

This matter comes before the Court on the *ex parte* Application of Karam Salah Al Din Awni Al Sadeq (“Mr. Al Sadeq” or “Applicant”), for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery by the Issuance of a Subpoena (the “Application”), which seeks documents, materials, and testimony from Dechert, LLP in connection with a foreign proceeding pending in the High Court of Justice of England and Wales, Queen’s Bench Division captioned: Karam Salah Al Din Awni Al Sadeq v. Dechert, LLP, Neil Gerrard, David Hughes, and Caroline Black, Claim No. QB-2020-000322 (the “Foreign Proceeding”).

The Court, having considered the Application, the Memorandum of Law in Support of the Application, and the Declarations of Tab K. Rosenfeld and Bambos Tsiattalou in Support of the Application, and good cause appearing, it is hereby ordered that:

1. The Application is **GRANTED**.
2. Applicant is hereby granted leave to issue a subpoena for documents, materials, and testimony in substantially the same form attached as Exhibit “C” to the Declaration of Tab K. Rosenfeld (the “Subpoena”), directing Dechert, LLP to produce the documents and materials requested in the Subpoena and testify under oath, as requested in the Subpoena.

ORDERED this ____ day of _____, 2020.

UNITED STATES DISTRICT JUDGE